

4.4 CULTURAL RESOURCES

4.4.1 Setting

a. Prehistory. Human occupation of the Scotts Valley area started in the Late Pleistocene, as early as 13,500 years ago. The earliest identified cultural pattern, the Ano Nuevo Pattern, featured a hunting-based Paleo-Indian subsistence system, as inferred from the stone tool assemblage. Two distinct phases were identified within this pattern: the Aruama Phase (11,500 to 13,500 B.P.) and the San Lorenzo Phase (11,000-10,000 B.P.). Evidence from the Aruama Phase indicates an emphasis on flaked stone tools made of local Monterey chert, and a relative absence of fire affected rock. Imported cherts (indicating possible development of trade relationships) and the first use of volcanic cobbles in tool production first appeared during the San Lorenzo Phase (Cartier, 1993, 243-254).

Traits of the later Archaic Scotts Valley Pattern include a biface industry, unifaces, use of quartzite and basalt in tool manufacture, eccentric crescents, rock features, use of red ochre, trade for obsidian, and ground stone milling tools. Two phases were identified within this pattern: the Umunhum Phase (9,500-8,500 B.P.) and the Scotts Valley Phase (7,500-5,900 B.P.). The Umunhum Phase saw the transition from hunting dominated economies to more diversified hunter-gatherer subsistence, as evidenced by the appearance of ground stone milling tools. The Scotts Valley Phase saw increased use of ground stone, indicating higher populations and/or increased dependence on floral resources (Cartier, 1993, 258-262).

A third cultural pattern, the Santa Cruz Pattern, saw the demise of the millingstone economy, reduced biface manufacture, the appearance of large side notched projectile points or knives, and the proliferation of cobble/core tools. Within this pattern, the Sandhill Bluff Phase (5500-400B.P.) featured increased use of local volcanic and quartzite rock, increased importation of Franciscan chert and obsidian, a slight decline in use of Monterey chert, and the near disappearance of biface production (Cartier, 1993, 262-263).

The later prehistory of Scotts Valley (after 4000 B.P.) is underrepresented in the data gathered in previous studies. However, the limited evidence suggests similarities with contemporary sites in the region. Artifacts associated with this period include projectile points with shallow side notches and flared expanding bases, and mortars and pestles, indicating transition to the acorn-based economy typically found during late prehistory throughout central California (Cartier, 1993, 263-265).

b. Ethnography. Scotts Valley is located within the ethnographic territory of the native Ohlone culture. Also referred to as the Costanoans (derived from the Spanish term for coastal people), the Ohlone were composed of approximately 40 independent tribelets with 8-12 different yet related languages (Penutian linguistic family) and similar cultures. With an estimated population of 7,000-10,000 prior to Spanish contact, their territory extended from San Francisco Bay in the north to Point Sur in the south, and inland as far as the Mount Diablo Range (Kroeber, 1976, 462-464; Margolin, 1978, 1-4, 61).

Living in villages averaging 250 inhabitants, the Ohlone people subsisted on marine and terrestrial resources. The sea provided shellfish such as mussels, clams, and oysters, fish such



as salmon and other inshore species, marine mammals such as seals, sea lions, and occasional scavenged whale carcasses. The Ohlone hunted terrestrial animals including deer, elk, antelope, rabbit, and various smaller animals. Plant foods included grass seeds, acorns, and seaweed. Tule reeds were used for construction of huts and boats. Villages had hereditary chiefs, whose power was limited within the largely egalitarian social structure (Kroeber, 1976, 466-469; Margolin, 1978, 1-19).

c. History. In 1769 Spanish explorer Gaspar de Portola arrived in the vicinity of the Ohlone village *Chatu-Mu*, along the San Lorenzo River near Monterey Bay. He named the hills above the river Santa Cruz (Spanish for “Holy Cross”). Twenty-two years later, Father Fermin Lasuen established Mission Santa Cruz in 1791, the twelfth mission founded in California. In 1796 Captain Pere d’Alberni founded a town on the east side of the San Lorenzo River called Villa Branciforte in honor of the Viceroy of New Spain, Miguel de la Grua Talamanca y Branciforte. This town later merged with the Mission and its pueblo, expanding what would become the town of Santa Cruz.

By the 1820s, Mexico had gained control of the area. To encourage settlement, the Spanish and later the Mexican government encouraged settlement by granting large tracts of former mission lands to private citizens. These became ranchos, where cattle and sheep were raised. In 1833, the Mexican Governor, Jose Figueroa, granted the Rancho San Augustin to Jose Antonio Bolcoff. The rancho, which encompassed Scotts Valley, raised livestock such as cattle and horses and crops such as wheat and barley. In 1850 Hiram Daniel Scott purchased Rancho San Augustin for \$20,000. For 15 years, the Scott family farmed and ranched land, selling the property to Joseph and Grace Errington in 1865. The Erringtons established the first dairy ranch in Scotts Valley. Over time they deeded away and sold off portions of the ranch, reducing its size to 732 acres. The Erringtons sold 290 acres to George Edwin Scott, brother of Hiram, who also established a dairy ranch. The trend of partitioning the land into increasingly smaller parcels continued into the 20th century as the population of Scotts Valley increased and diversified its livelihood beyond agriculture (Laffey and Pokriots, 1991).

In 1947, Skypark Airport was established in Scotts Valley (within the current project area). Built by Jack and Lola Graham on their property, this private airfield provided a facility for training pilots under terms of the G.I. Bill. In 1964, the City of Santa Cruz annexed Skypark Airport with the intention of enlarging and improving it, in order to establish Santa Cruz Municipal Airport. Unfortunately, the Federal Aviation Administration determined that the location and dimensions of the airport were not up to standards for that purpose and effectively cancelled the project.

In 1966, the City of Scotts Valley was incorporated. In 1968, the City of Santa Cruz leased the Skypark Airport to James Dahm, who realigned its runway. The airport continued operation until it closed in 1983.

d. Historic Resources. Scotts Valley has several sites of significant historic or cultural value. The City Hall site, located on Civic Center Drive, exemplifies the City’s rich heritage. It contains both the historic Scott House and a 10,000 year old archaeological deposit (Cartier, 1993). Other prehistoric archaeological sites also are known to exist in the area, and are recorded at the regional archaeological Information Center at Sonoma State University.



The City has prepared an archaeological sensitivity map to help guide development planning. According to Figure OS-2 of the Conservation and Open Space Element of the City's General Plan, there are two zones of primary concern, the high and moderate sensitivity zones. The low sensitivity zones are generally found in the upland portions of the Planning Area away from fresh water, while the high and moderate zones are found in the more level areas. The project site is located in the high and moderate sensitivity zone. Two structures have been designated within the City as historical resources:

- Scott House – 1853. Built in 1853 by Hiram D. Scott, the Valley's namesake, this Greek revival farmhouse was originally located along Scotts Valley Drive east of its present location at the Scotts Valley Civic Center. The house is a four room, one and a half story, mortise and tenon structure with a one-story attached ell. In 1936, the house was moved to its present location to make way for the widening of Scotts Valley Drive. Owned by the City, the house is currently on the National Register of Historic Places, being significant as an example of early 1850s architecture and for its association with the Scott family.
- Polo Barn – 1930. Designed by William W. Wurster, internationally known architect in the San Francisco Bay Area, noted for building designs include the Pasatiempo Golf Course south of Scotts Valley, and the Bank of America Headquarters and Ghirardelli Square located in San Francisco. Wurster also made a significant contribution to architectural education, becoming the dean of the architectural school and founder of the School of Environmental Design at the University of California, Berkeley.

The owner of the barn complex was Marion Hollins, a famous golfer, real estate speculator, and land developer. In the late 1920s, Ms. Hollins developed the Pasatiempo Golf Course, which was intended to rival Pebble Beach, located across the Monterey Bay. Hollins also raised ponies for the polo circuits and had the Polo Barns complex built around 1930.

e. Limited Cultural Resources Investigation. Applied EarthWorks conducted a limited cultural resources investigation of the project site. This involved a records search at the Northwest Information Center of the California Historical Resources Information System, housed at the Department of Anthropology at Sonoma State University, and a preliminary cultural resources reconnaissance of the project site.

Records Search. In May 2008, Applied EarthWorks obtained a records search from the Northwest Information Center of the California Historical Resources Information System, housed at the Department of Anthropology at Sonoma State University. The purpose of the records search was to identify previously recorded sites and prior studies within or near the current project area. In their review of materials, the Information Center examined their site location and survey coverage base maps, the National Register of Historic Places, the California Register of Historical Resources, California Historical Landmarks, California Points of Historical Interest, and the database of the California Historical Resources Information System. Information Center records indicate that 17 prior archaeological studies have been performed within or adjacent to the project area. These are listed in Table 4.4-1. Table 4.4-2 lists previously



recorded archaeological resources within the project area, while Table 4.4-3 shows recorded resources within one mile of the project site.

Table 4.4-1. Previous Archaeological Studies within One Mile of the Project Area

Author(s)	Year	NWIC Report Number	Title	Number of Recorded Sites
William Roop, Leo Barker, Charlene Detlefs	1977	S-3913	Cultural Resource Inventory of the Scotts Valley Wastewater Project Service Area	29
Paul Hampson, Gary Breschini	1982	S-5954	Preliminary Archaeological Reconnaissance of the Mendenhall Property on Mt. Hermon Road, Scotts Valley, Santa Cruz County, California	0
Rebecca Loveland Anastasio, James Bard	1984	S-7032	A Cultural Resources Assessment of Proposed Scotts Valley Square Shopping Center and Airport Mini-Storage Projects in the City of Scotts Valley, County of Santa Cruz	0
Robert Cartier, Charlene Detlefs, Glory Laffey	1980	S-8313	Cultural Resource Evaluation of the Scotts Valley Redevelopment Area in the City of Scotts Valley, County of Santa Cruz	7
Archaeological Resource Management	1989	S-10841	Cultural Resource Evaluation of the Kings Village Road Project in the City of Scotts Valley in the County of Santa Cruz	0
Robert Cartier	1989	S-11366	Cultural Resource Evaluation for the Sky Park Airport Property in the City of Scotts Valley	0
Archaeological Resource Management	1990	S-11470	Cultural Resource Evaluation for the Sky Park Airport Property in the City of Scotts Valley	0
Archaeological Resource Management	1989	S-12072	Cultural Resource Evaluation of the Light of Life Lutheran Church Property on Kings Village Road in the City of Scotts Valley, County of Santa Cruz	0
Archaeological Resource Management	1991	S-13328	Cultural Resource Evaluation for the Sky Park Airport Property in the City of Scotts Valley	0
Stephen Dietz	1986	S-17528	Santa Cruz, CA – Scotts Valley Branch Post Office (letter report)	0
Robert Cartier	1995	S-17867	Cultural Resource Evaluation of a Parcel for the Transit Site on the Corner of Blue Bonnet Lane and Kings Village Road, City of Scotts Valley, Santa Cruz	0
Thomas Jackson	1996	S-19012	Archaeological Reconnaissance of APN 2-211-26, -79 for the Proposed Coast Commercial Bank Development, City of Scotts Valley	0
Thomas Jackson	1998	S-20127	Archaeological Reconnaissance of the Rite Aid Pharmacy, Scotts Valley, CA	0
Larry Bourdeau	2000	S-23538	Results of Monitoring and Archaeological Investigations with Recommendations for Cultural Resource Management, Chris and George Ow. Jr./Walgreens Project, Parcel APN 022-601-102-10, -11 and -16: Mt. Hermon Road at Kings Drive, Scotts Valley, Santa Cruz County	1
Archaeological Resource Management	2000	S-24149	Cultural Resource Evaluation of the Scotts Valley Annex LLC Project in the City of Scotts Valley	1
Archaeological Resource Management	2000	S-24207	Cultural Resource Evaluation of the Graham Property in the City of Scotts Valley	0
Susan Morley	2001	S-24572	Cultural Resources Reconnaissance Report on the Project Parcel at 113 Navigator Drive, City of Scotts Valley, Santa Cruz County, California	0



Table 4.4-2. Previously Recorded Archaeological Sites within the Project Area

Trinomial	Primary No.	Description
CA-SCR-338	P-44-0439	Prehistoric habitation Site

Table 4.4-3. Previously Recorded Archaeological Sites within One Mile of the Project Area

Trinomial	Primary No.	Description
CA-SCR-88/H	-	Sparse lithic scatter
CA-SCR-342	P-44-0492	Prehistoric habitation Site

In 1989, 1990, and 1991, Robert Cartier of Archaeological Resource Management performed a series of archaeological surveys of the former Skypark Airport property, resulting in almost 100 percent survey coverage of the Scotts Valley Town Center Specific Plan area. Areas that Cartier did not survey (the Kings Village Shopping Center and the K-Mart Shopping Center) are covered by asphalt. Because of the extensive prior survey coverage, additional surveys were not conducted for this EIR.

Cartier’s reports indicate that he conducted a general reconnaissance survey of all areas with exposed soil and identified several archaeological and historical sites. However, none were formally recorded or filed with the Information Center. One archaeological site has been formally recorded within the Specific Plan area, and two others are recorded within one mile (see Tables 4.4-1 and 4.4-2). Two of these contain only prehistoric remains and one contains both prehistoric and historical materials.

The single prehistoric site recorded within the Specific Plan area was discovered in 2000 during grading for construction of the Walgreen’s store. CA-SCR-338 contains a scatter of flaked and ground stone artifacts with a maximum depth of 135 centimeters. Larry Bourdeau of Pacific Museum Consultants performed emergency excavations at the site after discovery, and recovered a small collection of artifacts including an obsidian biface, a chert projectile point tip, a basalt scraper, a sandstone milling tool, and about 20 pieces of chert, quartzite, and basalt flaking debris. The portion of the site within the Walgreen’s project area was completely destroyed during construction, but part of the site may still remain to the east.

Although not formally recorded as archaeological sites, Cartier noted two areas with historical remains and one with prehistoric cultural material. The location of one historical site can be determined with some accuracy based on Cartier’s description and map. The possible remains of the Locke family homestead, consisting of possible brick foundations or fireplace and other domestic debris, are located at the intersection of Mt. Hermon Road and Lockwood Lane, just outside the western boundary of the Specific Plan area. The southeastern portion of the site area is still undeveloped, possibly still containing undisturbed remnants of the homestead. It is possible that these remains extend into the Specific Plan area. Cartier did not map the site or define its extent in any detail.

The location of the prehistoric cultural material and a possible second historical site are less easily identified, as Cartier’s description references landmarks that are no longer present. The



area is generally identified at the northern end of the Specific Plan area, in what may be now the parking lot and skate park at the Sky Park recreation area. Cartier states:

Native soils were exposed near the old terminal building and on the opposite side of the parcel near the former lumbering operation ... Soils in these locations were characterized by a dark sandy loam with lithic quartzite and rhyolite debitage.

It is unclear where these locations are, although the “old terminal building” may now be a recreation center that is located near the “Area of Archaeological Sensitivity” indicated by Cartier. It is unknown where the former lumbering operation is located. Much of the area is now covered in park grass, a parking lot, and a skateboard park, with little exposed soil.

Preliminary Cultural Resources Reconnaissance. On April 21, 2008, Applied EarthWorks archaeologist Marc Linder visited the Scotts Valley Town Center Specific Plan area to make a preliminary assessment of the potential for significant cultural resources to be present on the property. This field inspection did not constitute an intensive Phase 1 archaeological or historical survey of the project area; its intent was to assess site conditions and cultural resource potentials. Fieldwork included a brief visual reconnaissance of the project area, including written observations and photo documentation.

The field inspection began in the northwest portion of the project area, in the area formerly occupied by Skypark Airport. The area is currently occupied by a Skypark Park, a dog park, a skate park, and a portion of the old airport. The partial airport runway and taxiway are in a state of ruin; the old asphalt pavement is weathered and cracked, with weeds growing through in many areas. Native sediments visible in the area (light grayish brown alluvial silt) appeared very disturbed; a cursory examination revealed no prehistoric or historical material. Moving east along Blue Bonnet Lane, the area is completely built out with commercial developments including the Scotts Valley Sports Center and a bus station with associated parking lot.

At the northeast corner of the project area is a large vacant lot where alluvial silts similar to those in the airport area were visible on the surface. Modern refuse is scattered throughout this area. The southeast portion of the project area is entirely developed with mini-malls, larger businesses (Nob Hill Foods and Walgreen’s), and commercial office space. To the west of this shopping/commercial center are the Scotts Valley Post Office, an adjacent RV Storage Facility, and a propane dealer.

The south end of the old airport property and an older propane dealership (Suburban Propane) are located to the west along Mt. Hermon Road. Another large shopping complex with a K-Mart and associated mini-mall are located further west; north of these is a mini-storage facility. Finally, at the west end of the project area is an open, partially wooded area, with exposed surface soils similar to those noted in other open areas. All surface soils exhibited a high degree of modern disturbance and no visible historical or prehistoric cultural materials.

Although this field reconnaissance did not constitute a formal cultural resources inventory, some preliminary conclusions can be offered regarding cultural resource potentials in the Specific Plan area. All buildings and structures observed were commercial in nature; most appear to be modern, but some may exceed the 50 year age criterion to be considered historical.



Further research and evaluation would be needed to confirm or deny the age or significance of buildings and structures in the plan area.

The Skypark Airport was established in 1947 and thus is more than 50 years old. Remnants of the aviation facility are present in the study area and should be fully documented and evaluated for significance.

Archaeological remains were not noted during this reconnaissance, but prior surveys of the area and archaeological discoveries during construction indicate that the area is highly sensitive and archaeological remains are likely to be present in both surface and buried contexts.

f. Regulatory Setting

California Register of Historical Resources (CRHR). The California Register is an authoritative guide in California to be used by state and local agencies, private groups, and citizens to identify the state's historical resources and to indicate which properties are to be protected, to the extent prudent and feasible, from substantial adverse change (Public Resources Code Section 5024.1(a)). The CRHR is overseen and administered by the State Historical Resources Commission. The criteria for listing resources on the CRHR are based on those developed by the National Park Service for listing on the National Register of Historic Places with modifications in order to include a broader range of resources which better reflect the history of California. A resource is considered historically significant if it:

- *Is associated with events or patterns of events that have made a significant contribution to the broad patterns of the history and cultural heritage of California and the United States.*
- *Is associated with the lives of persons important to the nation or to California's past.*
- *It embodies the distinctive characteristics of a type, period, region, or method of construction, or represents the work of an important creative individual, or possesses high artistic values.*
- *It has yielded, or may be likely to yield, information important to the prehistory or history of the State and the Nation.*

California Environmental Quality Act. Under CEQA, an impact on a historical resource is considered significant if the impact lessens the integrity of the qualities of the property that qualify it for the CRHR. If the proposed project may cause damage to a significant historical resource, the project may have a significant effect on the environment.

California Public Resources Code. Section 5097.9 of the California Public Resources Code (PRC) stipulates that it is contrary to the free expression and exercise of Native American religion to interfere with or cause severe irreparable damage to any Native American cemetery, place of worship, religious or ceremonial site, or sacred shrine.

Section 5097.5 of the PRC prohibits excavation or removal of any "vertebrate paleontological site or historical feature, situated on public lands, except with the express permission of the public agency having jurisdiction over such lands." PRC 30244 requires reasonable mitigation of adverse impacts to paleontological resources from development on public land. Penal Code Section 623 spells out regulations for the protection of caves, including their natural, cultural,



and paleontological contents. It specifies that no “material” (including all or any part of any paleontological item) will be removed from any natural geologically formed cavity or cave.

State Health and Safety Code. If human remains are discovered or exposed during construction, State Health and Safety Code Section 7050.5 requires that no further disturbance shall occur until the County Coroner has made the necessary findings as to origin and disposition pursuant to Public Resources Code Section 5097.98. If the remains are determined to be of Native American descent, the coroner has 24 hours to notify the Native American Heritage Commission (NAHC). The NAHC will then contact the most likely descendent of the deceased Native American, who will serve as a consultant on how to proceed with the remains (i.e., avoid, rebury).

City of Scotts Valley. The City’s General Plan Open Space and Conservation Element contains several objectives, policies, and actions pertaining to the protection of archaeological and historic resources.

- *OSO-394. Identify and obtain information on the existence of archaeological sites.*
- *OSP-395. Working cooperatively with appropriate organizations and professionals, the City shall compile relevant information on the location and significance of its archeological resources.*
- *OSA-396. The City has prepared an archaeological sensitivity zone map (Figure OS-2) as part of this plan; this map shall be updated regularly by the Cultural Resource Preservation Commission based on data received from archaeological field reports.*
- *OSO-397. Establish measures to protect potentially significance archaeological resources.*
- *OSP-398. The archaeological sensitivity zone map shall be used, along with other appropriate data, to evaluate whether archaeological resources are threatened by proposed development projects.*
- *OSA-399. All proposed development with high and moderate sensitivity zones shall be required to produce an archaeological field reconnaissance and report for approval by the Cultural Resource Preservation Commission.*
- *OSA-400. Through the permit process, new development which could adversely effect archaeological resources shall be required to provide mitigation measures that avoid or substantially reduce the significant environmental effect prior to project approval*
- *OSO-403. The City shall continue to maintain an up to date inventory of and encourage the maintenance of designated historical sites, structures, and objects which merit protection for their historic value.*
- *OSA-404. The City shall develop a program for the preservation of historical resources.*
- *OSA-405. All proposed development on the site of an existing or former historic structure shall require a historical archaeological field reconnaissance and report prior to project consideration by the decision making body.*
- *OSP-406. The City shall encourage public and private efforts to restore designated historic structures and to continue their use as an integral part of the community.*
- *OSA-407. The City shall protect and enhance designated historic structures through the environmental, permit, and design review process.*
- *OSA-408. The City shall apply and/or encourage private parties to apply for historic preservation and restoration grants for historically designated structures.*



- *OSP-409. The City shall not permit the destruction of the historical resources identified in this General Plan without a prior public hearing and consideration given to preservation alternatives.*

4.4.2 Impact Analysis

a. Methodology and Impact Criteria. Appendix G of the *State CEQA Guidelines* states that a project would result in a potentially significant impact if it would:

- *Cause a substantial adverse change in the significance of a historical resource as defined in §15064.5;*
- *Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5;*
- *Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature; and/or*
- *Disturb any human remains, including those interred outside of formal cemeteries.*

Section 15064.5 of the *State CEQA Guidelines* pertains to the determination of the significance of impacts to archaeological and historic resources. Direct impacts may occur by:

- (1) *Physically damaging, destroying, or altering all or part of the resource;*
- (2) *Altering characteristics of the surrounding environment that contribute to the resource's significance;*
- (3) *Neglecting the resource to the extent that it deteriorates or is destroyed. Indirect impacts primarily result from the effects of project-induced population growth. Such growth can result in increased construction as well as increased recreational activities that can disturb or destroy cultural resources; or*
- (4) *The incidental discovery of cultural resources without proper notification.*

Indirect impacts result primarily from the effects of project-induced population growth. Such growth can result in increased construction as well as increased recreational activities that can disturb or destroy cultural resources.

b. Project Impacts and Mitigation Measures

Impact CR-1 **Subsequent development of the Specific Plan area has the potential to impact significant archaeological resources as defined at Section 15064.5 of the CEQA Guidelines. This is considered a Class II, significant but mitigable impact.**

As discussed in Section 4.4.1 above, cultural resources investigations conducted to date indicate a reasonable possibility that archaeological remains are preserved in and around the Specific Plan area. Future development could result in significant impacts to archaeological sites by physically damaging, destroying, or altering the characteristics of properties that qualify for the CRHR. Implementation of the mitigation measures below would reduce those impacts to less than significant levels.



Mitigation Measures.

- CR-1(a) Subsurface Investigation.** The City shall ensure that a subsurface archaeological investigation of any parcel proposed for subsequent development is completed prior to certification or adoption of any subsequent CEQA document tiered from this Program EIR. The subsurface archaeological investigations shall employ excavation techniques sufficient to ensure that any known, suspected, or potential prehistoric or historical remains are identified, including backhoe trenching and screening of samples, controlled grading, hand excavated shovel probes and test excavation units, and/or comparable sampling units.
- CR-1(b) Eligibility Determination.** Any archaeological remains encountered during subsurface archaeological investigations described in CR-1(a) shall be evaluated for significance and eligibility for the CRHR. At a minimum, such evaluation shall define the physical extent of the site both horizontally and vertically, identify its content and integrity, and determine whether the site has important prehistoric or historical associations or scientific information potential.
- CR-1(c) Resource Avoidance.** If archaeological remains identified and evaluated under CR-1(a) and CR-1(b) are found to meet CRHR eligibility criteria and thus qualify as historical resources per Section 5024.1 of the Public Resources Code, the City, project proponent, and project archaeologist shall consult to determine whether or not the site(s) can be avoided during subsequent development. If avoidance is not feasible, then impacts to the site shall be mitigated through data recovery excavation. Per *State CEQA Guidelines*, Section 15126.4(c), the City shall ensure that a data recovery plan making provision for adequately recovering the scientifically consequential information from and about the site is prepared and adopted prior to any excavation being undertaken.

All activities described under CR-1(a) through CR-1(c) shall be funded by the project proponent and shall be directed by an archaeologist who meets the *Secretary of the Interior's Professional Qualification Standards*. All cultural materials and associated records recovered during such investigations shall be processed in a laboratory, analyzed, cataloged, and curated at an appropriate local facility. Final reports on these investigations shall meet current professional standards as outlined in *Archaeological Resource Management Reports: Recommended Content and Format* published by the California Office of Historic Preservation. Copies of such reports shall be filed with the City and the regional



Information Center of the California Historical Resources Information System.

Significance After Mitigation. Through the implementation of the proposed mitigation measures, impacts to archaeological resources would be considered less than significant.

Impact CR-2 Subsequent development of the Specific Plan area has the potential to impact significant historical buildings, structures, and sites. This is considered a Class II, *significant but mitigable* impact, except if historically significant buildings or structures were substantially damaged or destroyed, in which case the impact would remain Class I, *significant and unavoidable*.

As discussed in Section 4.4.1 above, certain buildings and structures within the Specific Plan area may be more than 50 years old, and thus may qualify as significant historical resources as defined at Section 15064.5 of the *State CEQA Guidelines*. Similarly, the Skypark Airport was established in 1947 and thus is more than 50 years old. Future development could result in significant impacts to historical resources by physically damaging, destroying, or altering the characteristics of such properties that qualify them for the CRHR. Implementation of the mitigation measures below may reduce those impacts to less than significant levels.

CR-2(a) Structure Evaluation. The City shall determine the age and significance of any buildings or structures on any parcels proposed for subsequent development prior to certification or adoption of any subsequent CEQA document tiered from this Program EIR. Any buildings or structures greater than 50 years old shall be evaluated for significance and eligibility to the CRHR. Such evaluations shall be performed by an architectural historian meeting the Secretary of Interior's Professional Qualifications Standards and within the context of local and regional history.

CR-2(b) Building Preservation or Relocation. The City, project proponent, and project architectural historian shall consult to seek ways to avoid or minimize subsequent project impacts to any buildings or structures determined to be significant historical resources per Section 5024.1 of the Public Resources Code. Preservation in place through maintenance, repair, stabilization, restoration, preservation, conservation, or reconstruction in a manner consistent with the Secretary of the Interior's Standards and Guidelines (Weeks and Grimmer, 1995) generally will constitute mitigation of impacts to a less-than-significant level.

If preservation in place is not feasible, then relocation of significant resources or documentation through archival quality photographs, measured drawings, and narrative historical descriptions of the building or structure's history and important historical associations may lessen impacts, but may not reduce them to less than significant levels.



CR-2(c) Airport Evaluation. Prior to further development of the properties encompassing the former Skypark Airport, the City shall ensure that the significance of the airport is evaluated by a qualified historian meeting the *Secretary of Interior's Professional Qualifications Standards*. If the former airport qualifies as a significant historical resource as defined at Section 15064.5 of the CEQA Guidelines, the City, project proponent, and project historian shall consult to seek ways to avoid or minimize subsequent project impacts to the property.

Significance After Mitigation. Implementation of the proposed mitigation measures may reduce those impacts to less than significant levels. However, physical destruction of significant historical buildings or structures – if further investigation determines that such buildings exist, and may be impacted through subsequent development – would still be a Class I, significant unmitigable impact.

c. Cumulative Impacts. Development under the proposed Specific Plan in conjunction with buildout of the City has the potential to cumulatively impact cultural and historic resources. Existing General Plan policies are intended to fully protect known archaeological resources, and onsite monitoring and proper handling of potentially uncovered resources would address this impact to a less than significant level. Cumulative impacts to such resources would therefore be addressed on a case-by-case basis as projects are considered. Cumulative impacts would therefore be less than significant with project-specific mitigation as described above.

